

STATE OF TENNESSEE

Office of the Attorney General



RECEIVED  
2003 OCT 23 PM 3:55

T.R.A. DOCKET ROOM

**PAUL G. SUMMERS**  
ATTORNEY GENERAL AND REPORTER

MAILING ADDRESS

P O BOX 20207  
NASHVILLE, TN 37202

**ANDY D. BENNETT**  
CHIEF DEPUTY ATTORNEY GENERAL

**LUCY HONEY HAYNES**  
ASSOCIATE CHIEF DEPUTY  
ATTORNEY GENERAL

**MICHAEL E. MOORE**  
SOLICITOR GENERAL

CORDELL HULL AND JOHN SEVIER  
STATE OFFICE BUILDINGS

TELEPHONE 615-741-3491  
FACSIMILE 615-741-2009

October 23, 2003

Honorable Deborah Taylor Tate  
Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243

**RE: PETITION OF CHATTANOOGA GAS COMPANY, NASHVILLE GAS COMPANY, A  
DIVISION OF PIEDMONT NATURAL GAS COMPANY, INC., AND UNITED CITIES  
GAS COMPANY, A DIVISION OF ATMOS ENERGY CORPORATION FOR A  
DECLARATORY RULING REGARDING THE COLLECTIBILITY OF THE GAS COST  
PORTION OF UNCOLLECTIBLE ACCOUNTS UNDER THE PURCHASED GAS  
ADJUSTMENT ("PGA") RULES  
Docket No. 03-00209**

Dear Chairman Tate:

Enclosed is an original and thirteen copies of an Amended Request to Take Official Notice filed by the Consumer Advocate & Protection Division of the Office of the Attorney General in the above-referenced matter. Kindly file same in this docket. By copy of this letter, we are serving all parties of record. If you have any questions, please feel free to contact me at (615) 532-3382. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Shilina B. Chatterjee".

Shilina B. Chatterjee  
Assistant Attorney General  
(615) 532-3382

Enclosures

cc: Kim Beals, Esq.  
Hearing Officer  
All Parties of Record

70022

**IN THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

<b>IN RE:</b>	)	
	)	
<b>PETITION OF CHATTANOOGA GAS</b>	)	<b>DOCKET NO. 03-00209</b>
<b>COMPANY, NASHVILLE GAS COMPANY, A</b>	)	
<b>DIVISION OF PIEDMONT NATURAL GAS</b>	)	
<b>COMPANY, INC., AND UNITED CITIES GAS</b>	)	
<b>COMPANY, A DIVISION OF ATMOS</b>	)	
<b>ENERGY CORPORATION FOR A</b>	)	
<b>DECLARATORY RULING REGARDING THE</b>	)	
<b>COLLECTIBILITY OF THE GAS COST</b>	)	
<b>PORTION OF UNCOLLECTIBLE</b>	)	
<b>ACCOUNTS UNDER THE PURCHASED GAS</b>	)	
<b>ADJUSTMENT ("PGA") RULES</b>	)	

---

**AMENDED REQUEST TO TAKE OFFICIAL NOTICE FILED BY THE CONSUMER  
ADVOCATE & PROTECTION DIVISION OF THE OFFICE OF THE ATTORNEY  
GENERAL**

---

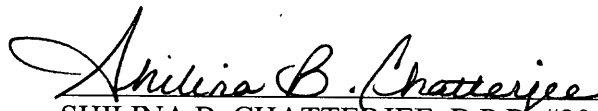
On August 29, 2003, Hearing Officer Lynn Questell issued an order holding in abeyance the August 20, 2003 Request to Take Official Notice filed by the Consumer Advocate & Protection Division of the Office of the Attorney General's (CAPD). The hearing officer directed the CAPD to identify specific documents for the TRA to take official notice of in this docket. Therefore, we file this amendment pursuant to the Order dated August 29, 2003. We reserve our right to supplement this amendment since there are additional documents that we request that the TRA take official notice of in this docket. Pursuant to Tenn. Code Ann. § 4-5-313(6), the Consumer Advocate and Protection Division of the Office of the Attorney General ("CAPD") hereby requests that the Tennessee Regulatory Authority ("TRA") take official notice of the following:

1. CAD Exhibits dated September 19, 1997. *In Re Petition of Chattanooga Gas Company*

*to Place Into Effect a Revised Natural Gas Tariff*, Docket No. 97-00982.

2. Dan McCormac Direct Testimony & CAPD Joint Exhibit, Schedule 11 dated August 18, 2003, *In Re Application of Nashville Gas Company, A Division of Piedmont Natural Gas Company, Inc. for an Adjustment of its Rates and Charges for Approval of Revised Tariffs and Approval of Revised Service Regulations*, Docket No. 03-00313.
3. Direct Testimony CAD Exhibits, dated September 25, 1995, *In Re Petition of United Cities Gas Company, a Division of Atmos Energy Corporation, to Place Into Effect Revised Tariff Sheets*, Docket No. 95-02258.
4. Order on Request for Special Accounting Treatment, Attorney General's Reply Comments dated October 24, 2001, Letter dated October 25, 2001 from James P. West, Esq. of West Law Offices, P.C. on behalf of Carolina Utility Customers Association, Motion and Response of Piedmont Natural Gas Company to Reply Comments of the Attorney General dated October 26, 2001. *In the Matter of Application of Piedmont Natural Gas Company, Inc. for Approval of Special Accounting Procedures*, Docket No. G-9, SUB 453.

RESPECTFULLY SUBMITTED,

  
SHILINA B. CHATTERJEE, B.P.#. #20689  
Assistant Attorney General  
Office of the Attorney General  
Consumer Advocate and Protection Division  
P.O. Box 20207  
Nashville, Tennessee 37202  
(615) 532-3382

Dated: October 23, 2003

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served via hand delivery or facsimile on October 23, 2003.

For Chattanooga Gas:

Larry Buie, General Manager  
Chattanooga Gas Company  
2207 Olan Mills Drive  
Chattanooga, TN 37421  
(423) 490-4300

Archie Hickerson  
Manager-Rates  
AGL Resources  
Location 1686  
P.O. Box 4569  
Atlanta, GA 30302-4569  
(404) 584-3855

D. Billye Sanders  
Waller, Lansden, Dortch & Davis, PLLC  
511 Union Street, Suite 2100  
Nashville, TN 37219-1760  
(615) 244-6380

For Nashville Gas:

David Carpenter  
Director-Rates  
Piedmont Natural Gas Company, Inc.  
P.O. Box 33068  
Charlotte, NC 28233  
(704) 364-3120


Bill R. Morris  
Director- Corporate Planning & Development Services  
Piedmont Natural Gas Company, Inc.  
P.O. Box 33068  
Charlotte, NC 28233  
(704) 364-3120

James H. Jeffries IV, Esq.  
Jerry W. Amos  
Nelson, Mullins, Riley & Scarborough, L.L.P.  
Bank of America Corporate Center, Suite 2400  
100 North Tyron Street  
Charlotte, NC 28202  
(704) 417-3000

For United Cities Gas:

Patricia Childers  
Vice President of Regulatory Affairs  
United Cities Gas Company  
Atmos Energy Corporation  
810 Crescent Centre Drive, Suite 600  
Franklin, TN 37067-6226  
(615) 771-8332

Joe A. Conner, Esq.  
Misty S. Kelley, Esq.  
Baker, Donelson, Bearman & Caldwell  
1800 Republic Centre  
633 Chestnut Street  
Chattanooga, Tennessee 37450-1800  
(423) 756-2010

  
SHILINA B. CHATTERJEE  
Assistant Attorney General